

January 15, 2021

ELECTRONICALLY FILED VIA REGULATIONS.GOV

Alexandra Dapolito Dunn
Assistant Administrator, OCSPP
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Comments of the Chemical Users Coalition regarding EPA's Draft Compliance Guide for Imported Articles Containing Surface Coatings Subject to the LCPFAC SNUR; Docket EPA-HQ-OPPT-2020-0621

Dear Ms. Dunn:

The Chemical Users Coalition ("CUC") is providing the enclosed comments on EPA's Draft Compliance Guide for Imported Articles Containing Surface Coatings Subject to the Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances Significant New Use Rule.

CUC is an association of companies from diverse industries that are interested in chemical management policy from the perspective of those who use, rather than manufacture, chemical substances.¹ CUC encourages the development of chemical-regulatory policies that protect human health and the environment while simultaneously fostering the pursuit of technological innovation. Aligning these goals is particularly important in the context of chemical management policy in a global economy. Our comments are offered to support the Agency's efforts to provide guidance to entities in the regulated community concerning how the Agency intends to interpret its regulations as affected parties seek to implement practical measures to ensure compliance with Agency rules.

¹ The members of CUC are Airbus S.A.S., The Boeing Company, HP Incorporated, IBM Company, Intel Corporation, Lockheed Martin Corporation, and Raytheon Technologies Corporation.

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The CUC appreciates your consideration of these comments. If you have any questions relating to these comments, please feel free to contact me.

Sincerely,



Lawrence E. Cullen

Enclosure

cc (w/encl): Yvette Collazo Reyes, U.S. Environmental Protection Agency
Mark Hartman, U.S. Environmental Protection Agency
Tyler Lloyd, U.S. Environmental Protection Agency